

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BRIAN MURRAY, individually and on
behalf of others similarly situated,

Plaintiff,

v.

LEMONADE, INC.,

Defendant.

Case No. 1:25-cv-04106-JHR-KHP

LESLIE LINWOOD RICH, on behalf of
himself and other similarly situated
individuals,

Plaintiff,

v.

LEMONADE, INC.,

Defendant.

Case No. 1:25-cv-04851-JHR-KHP

GREGORY KLEIN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

LEMONADE, INC. and LEMONADE
INSURANCE AGENCY, LLC,

Defendants.

Case No. 1:25-cv-05490-JHR-KHP

**JOINT STIPULATION AND ORDER CONSOLIDATING CASES AND SETTING
DEADLINES FOR CONSOLIDATED COMPLAINT
AND RESPONSES THERETO**

Plaintiffs Brian Murray, Leslie Linwood Rich, and Gregory Klein, and defendants Lemonade, Inc. and Lemonade Insurance Agency, LLC, through their undersigned counsel, hereby agree and stipulate that, subject the Court's approval: (1) their cases should be consolidated, (2) the plaintiffs should file a consolidated complaint within 30 days of the Court's entry of its order on this stipulation, and (3) responses to the consolidated complaint shall be filed within the schedule provided below:

1. On May 15, 2025, plaintiff Brian Murray commenced the putative class action *Murray v. Lemonade, Inc.*, No. 1:25-cv-04106.

2. On June 9, 2025, plaintiff Leslie Linwood Rich commenced the putative class action *Rich v. Lemonade, Inc.*, No. 1:25-cv-04851.

3. On June 12, 2025, counsel in *Murray* wrote to the Court requesting that *Murray* and *Rich* be consolidated. No. 1:25-cv-04106, ECF No. 7. On June 13, 2025, that letter motion was referred to Magistrate Judge Katharine H. Parker, and it has not yet been decided. *Id.* at ECF No. 10.

4. On July 2, 2025, plaintiff Gregory Klein commenced the putative class action *Klein v. Lemonade, Inc., et al.*, No. 1:25-cv-05490 (together with *Murray* and *Rich*, the "Related Cases").

5. On July 8, 2025, *Klein* was related to *Murray* and reassigned to this Court. No. 1:25-cv-05490.

6. Each of the Related Cases stems from a data security incident suffered by defendants Lemonade, Inc. and Lemonade Insurance Agency, LLC between April 1, 2023, and September 18, 2024.

7. Accordingly, the parties agree that the Related Cases should be consolidated into the first-filed case, under the caption (“Consolidated Action”):

IN RE LEMONADE, INC. DATA
DISCLOSURE LITIGATION

Case No. 1:25-cv-04106-JHR-KHP

8. The parties further agree to the following schedule for the filing of a consolidated complaint and the briefing of responses thereto:

- a. Plaintiffs shall file a consolidated complaint in the Consolidated Action within **30 days** of the date on which this stipulation is granted by the Court.
- b. Defendants shall have **30 days** to respond to the consolidated complaint, and in any event no less time than defendants otherwise would have to respond to the latest-filed individual complaint in the Related Cases given defendants’ agreement to waive service in each of the above-referenced cases (i.e., until September 8, 2025). *See* No. 1:25-cv-04106, ECF No. 6; No. 1:25-cv-04851, ECF No. 7; No. 1:25-cv-05490, ECF Nos. 8-9.
- c. Plaintiffs shall have **30 days** to oppose to any motion to dismiss filed by defendants.
- d. Defendants shall have **14 days** after the filing of plaintiffs’ opposition brief to file any reply brief in further support of their motion to dismiss.

9. The parties reserve the right to seek consolidation or joinder of additional related actions in the future either by stipulation or motion, as appropriate.

[signatures on next page]

Dated: July 23, 2025¹

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¹ In accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions, the filer represents that the other signatories on this document have consented to its filing.

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Counsel for Plaintiff Gregory Klein and the Class

CONSOLIDATION ORDER

The Court, having considered the above stipulation and good cause appearing therefore, hereby orders as follows:

1. *Murray v. Lemonade, Inc.*, No. 1:25-cv-04106; *Rich v. Lemonade, Inc.*, No. 1:25-cv-04851; and *Klein v. Lemonade, Inc., et al.*, No. 1:25-cv-05490, are consolidated under the first-filed case and shall bear the caption: *In re Lemonade, Inc. Data Disclosure Litigation*, No. 1:25-cv-04106-JRH-KHP.
2. The Clerk of the Court is directed to consolidate the matters as set forth above and thereafter to mark case numbers 1:25-cv-04851 and 1:25-cv-05490 closed to any additional filings under those case numbers and to amend the title of the *Murray* action to: *In re Lemonade, Inc. Data Disclosure Litigation*.
3. The parties shall comply with the following schedule:
 - a. Plaintiffs shall file a consolidated complaint in the Consolidated Action within **30 days** of the entry of this order.
 - b. Defendants shall respond to the consolidated complaint within **30 days** of its filing or by September 8, 2025, whichever is later;
 - c. Plaintiffs shall have **30 days** to oppose to any motion to dismiss filed by defendants.
 - d. Defendants shall have **14 days** after the filing of plaintiffs' opposition brief to file any reply brief in further support of their motion to dismiss.

The Clerk is respectfully directed to terminate the motion in Docket No. 25-cv-4106, ECF No. 7, which is hereby **denied as moot. ITISSO ORDERED.**

Dated: 7/28/2025
New York, New York



HON. KATHARINE H. PARKER
United States Magistrate Judge